

1 Heinz Binder (SBN 87908)
Robert G. Harris (SBN 124678)
2 David B. Rao (SBN 1031477))
BINDER & MALTER, LLP
3 2775 Park Avenue
Santa Clara, CA 95050
4 Tel: (408) 295-1700
Fax: (408) 295-1531
5 Email: Heinz@bindermalter.com
Email: Rob@bindermalter.com
6 Email: David@bindermalter.com

7
8 Attorneys for Debtor and Debtor-in-Possession
TECHNOLOGY PROPERTIES LIMITED LLC

9
10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN JOSE DIVISION**

13 In re:

14 TECHNOLOGY PROPERTIES LIMITED,
15 LLC, a California limited liability company,
16 Debtor.

Case No.: 13- 51589SLJ

Chapter 11

Date: August __, 2014

Time: _____.m.

Place: Courtroom 3099
280 South First Street
San Jose, California

17
18
19
20
21 **STIPULATION FOR EMERGENCY USE OF CASH COLLATERAL (FRBP 4001(b))**

22 IT IS HEREBY STIPULATED by and between Technology Properties Limited LLC
23 (“TPL”), Cupertino City Center Buildings, A California Limited Partnership, Swamy Venkidu,
24 and Daniel E. Leckrone that pending court approval of TPL’s Fourth Motion to Approve Use of
25 Cash Collateral, TPL has permission to use cash collateral on an emergency basis to pay the
26

1 expenses and in the amounts shown on its current cash collateral budget, a copy of which is
2 attached hereto as Exhibit "A".

3 Dated: August 8, 2014

SCHNADER HARRISON SEGAL & LEWIS LLP

4 By: /s/ Christopher H. Hart

5 Christopher H. Hart
6 Attorneys for Cupertino City Center Buildings,
A California Limited Partnership

7 Dated: August 8, 2014

ELLAHIE & FAROOQUI, LLP

8 By: /s/ Javed Ellahie

9 Javed Ellahie
10 Attorneys for Swamy Venkidu as Shareholder Agent
for a group of shareholders

11 Dated: August 7, 2014

/s/Daniel E. Leckrone

12 Daniel E. Leckrone

13
14 Dated: August 8, 2014

BINDER & MALTER, LLP

15 By: /s/ David B. Rao

16 David B. Rao
Attorneys for Technology Properties Limited, LLC

17 Dated: August 7, 2014

DORSEY & WHITNEY, LLP

18 By: /s/ Robert A. Franklin

19 Robert A. Franklin
20 Attorney for Official Committee of Unsecured
Creditors

21
22
23 F:\Clients\TPL Chap. 11\Pleadings\Cash Collateral\Stipulation to Use Cash Collateral.8.7.14

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CASH COLLATERAL BUDGET

US Trustee fees	\$975.00
Patent Maintenance fees	\$19,203.03
Hartford general liability insurance	\$6,352.96
Unsecured property tax	\$780.34
Storage rental for files and records (lease is up)	\$512.00
Storage \$106/month x 2 months	
Movers \$300	
Heffernan/Chubb	\$1,563.12
Heffernan/EP	\$1,715.00
Total	\$31,101.45

EXHIBIT "A"